

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA

COMERICA BANK,

Plaintiff,

vs.

OCEAN 4660, LLC, et. al.,

Defendants.

GENERAL JURISDICTION DIVISION

CASE NO.: CACE11028447 (03)

**NOTICE OF TAKING DEPOSITION OF  
ALAN BLANKSTEIN**

**VIA EMAIL TO:**

Alan Blankstein,  
Vice President of Special Assets Group  
Comerica Bank  
c/o Brian Hole, Esq.  
Holland & Knight  
515 East Las Olas Blvd., Ste. 1200  
Ft. Lauderdale, FL 33301  
[Brian.hole@hkclaw.com](mailto:Brian.hole@hkclaw.com)

**PLEASE TAKE NOTICE** that the undersigned counsel for Defendants, OCEAN 4660, LLC, OCEAN 4660, LLC, HANNA KARCHO-POLSELLI and REMO POLSELLI, will take the deposition of **ALAN BLANKSTEIN**, Vice President of Plaintiff, Comerica Bank's Special Assets Group<sup>1</sup>, on **Wednesday, March 20, 2013 at 2:00 p.m., at the offices of Holland & Knight, 515 East Las Olas Boulevard, Suite 1200, Fort Lauderdale FL 33301**, upon oral examination before Veritext, LLC, or any other notary public or officer authorized to take depositions in the State of Florida.

The oral examination will continue from day to day until completed. The deposition is being taken for the purpose of discovery and for use at trial, or for such other purposes as are permitted under the Rules of Court.

**If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Phone Line at (954) 831-6364; 201 SE 6th Street, Fort Lauderdale, FL 33301 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.**

<sup>1</sup> The Rule providing for deposition of a corporation by having the corporate party designate an officer, director or managing agent to testify on its behalf **does not preclude an opposing party from noticing the deposition of a particular corporate officer.** See *Plantation-Simon Inc. v. Bahloul*, 596 So.2d 1159 (Fla. 4th DCA 1992). A party has the right to take deposition of any officer or director of a corporation already named and served as party, **by simple notice without necessity of serving the official with a witness subpoena.** *Id.*

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that on the 4 day of Feb, 2013 a genuine copy of the foregoing was served via email, pursuant to Fla. R. Jud. Admin. 2.516, upon: *SEE ATTACHED SERVICE LIST*.

**ROTHMAN & TOBIN, P.A.**

11900 Biscayne Blvd., Suite 740

North Miami, Florida 33181

Telephone: (305) 895-3225

Facsimile: (305) 895-7175

Primary E-Mail: [mtobin@rothmanandtobin.com](mailto:mtobin@rothmanandtobin.com)

Secondary E-Mail: [bfortun@rothmanandtobin.com](mailto:bfortun@rothmanandtobin.com)

By: 

Michael S. Tobin, Esq.

Florida Bar No. 958931

Paula Levy, Esq.

Florida Bar No. 0117031

cc: Veritext, LLC

### SERVICE LIST

<p>Brian Hole, Esq. Holland &amp; Knight 515 East Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 Telephone: (954) 468-7910 Fax: (954) 463-2030 (Via Email) <a href="mailto:brian.hole@hklaw.com">brian.hole@hklaw.com</a> Counsel for Comerica Bank</p>	<p>Eduardo M. Soto, Esq. Weiss Serota Helfman Pastoriza Cole &amp; Boniske, P.L. 2525 Ponce de Leon Blvd., Suite 700 Coral Gables, FL 33134 Telephone: (305) 854-0800 Fax: (305) 854-2323 (Via Email) <a href="mailto:esoto@wsh-law.com">esoto@wsh-law.com</a> Counsel for Town of Lauderdale-By-The Sea</p>
<p>Maya A. Moore, Esq. Joni Armstrong Coffey, Esq. County Attorney for Broward County Office of the County Attorney Governmental Center, Suite 423 115 South Andrews Avenue Ft. Lauderdale, FL 33301 Telephone: (954) 357-7600 Fax: (954) 357-7641 (Via Email) <a href="mailto:mmoore@broward.org">mmoore@broward.org</a> Counsel for Broward County</p>	<p>Oceanside Lauderdale, Inc. 2310 East Atlantic Blvd., Suite 206 Pompano Beach, FL 33062 (Via U.S. Mail)</p>
<p>Kenneth A. Frank, <i>Pro Se</i> 2310 East Atlantic Blvd., Suite 206 Pompano Beach, FL 33062 (Via Email) <a href="mailto:kenknaassociates@gmail.com">kenknaassociates@gmail.com</a></p>	<p>Waste Management Inc. of Florida d/b/a Southern Sanitation Service c/o Registered Agent, CT Corporation System 1200 South Pine Island Road Plantation, FL 33324 (Via U.S. Mail)</p>
<p>Angela Dipilato 2310 East Atlantic Blvd., Suite 206 Pompano Beach, FL 33062 (Via U.S. Mail)</p>	<p>Angela Dipilato 1323 S.E. 3<sup>rd</sup> Avenue Pompano Beach, FL 33060 (Via U.S. Mail)</p>
<p>Affinity Mechanical Inc. c/o Edward J. Bender, Registered Agent 2805 E. Oakland Park Blvd., #144 Ft. Lauderdale, FL 33306 (Via U.S. Mail)</p>	<p>Motion Elevator, Inc. c/o Registered Agent, Rose Portelli 5915 Park Drive Margate, FL 33063 (Via U.S. Mail)</p>
<p>Rose Portelli 5915 Park Drive Margate, FL 33063 (Via U.S. Mail)</p>	<p>Euro First Choice Enterprises, Inc. c/o Registered Agent, Michal Holovka 1261 S.E. 7<sup>th</sup> Avenue Pompano Beach, FL 33060 (Via U.S. Mail)</p>
<p>Michal Holovka 1261 S.E. 7<sup>th</sup> Avenue Pompano Beach, FL 33060 (Via U.S. Mail)</p>	